

EPA Regional Director

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Comments concerning proposal of CR 595 File 11-52-0075-P

Stated purposes of the road are already fulfilled from both north and south entries except the hauling of ore from the Kennecott Project directly to the south location of the Humboldt Mill.

Prudent and reasonable alternatives that were considered but not chosen in previous application still are available for consideration. Stating that areas east of the Silver Lake Basin previously considered and now rejected out of hand for safety reasons and implying the work performed on the following: Silver Lake Basin Dam, newly installed fuse plug, and newly installed bridge on CR 510 are somehow substandard allowing for future failure causing numerous conditions that would isolate the rural communities north of the bridge are not scientifically proven. I am not addressing any particular route, just stating that the alternative and reasonable qualifiers are skewed to force a singular decision.....

Specific details as to the actual consideration of alternatives are missing in the application such as impact statements and specific costs to designing a building specific sections of the road...

Some alternatives compromise sensitive nesting areas of threatened, endangered, and rare birds (Kirtland's Warbler, Cerulean Warbler, Spruce Grouse)

This permit contains several stream crossings and proposed installations of culverts and bridges. While it may administratively complete.....so is a test with all the answers filled in appropriate boxes.....though the answers may not be the best for the stated question...likewise each of these installation has only one choice. It is quite typical to have more than one choice when applying for stream crossings.....especially when long term data of hydrological flow is not available for such an aggressive project. The record show that the Dead River CR 510 crossing had 20 something alternatives.....with years of hydrological data.....Specifically the bridge crossings at the Yellow Dog River offers excessive impact on an already troubled area..... Since hydrologic data is based on flow through the bridge and not the flood plain during events and rapid melt down; it does not adequately address the actual high water mark.....Although this area could use considerable improvement irrespective of the proposed road.

The original permits stated route AAA, CR510, and CR 550. While it seems to be a prudent business plan to build a by-pass through the Forestville corridor, it does not exist as an alternative in the plan for the basic route for the hauling of the ore. Why?

The Wetland mitigation of the CR 595 using the AAA crossings at the East branch headwater of Salmon Trout in the vicinity of the Northwest road is most inappropriate, since it involves moving and/or repairing an existing road that has been proposed for decades and tying unto this proposal.....That stretch of road should have been correctly addressed when the widening of the AAA corridor was done in 2010-2011. (Refer to Lake Superior Watershed Partnership archival Salmon Trout Proposals) Does not seem to fit the 404 compliance for Wetland Mitigation.

The total area in question for proposal CR 595 is most unique in topography and hydrology.....such that any incident on the proposed road would have irreparable harm to the ecosystems downstream and immediate corridor proposed by this project. Historically when roads are built into remote areas incidents involving personal safety increase; thus requiring more emergency services. Haul roads are not typically safe for continued recreational use; ask any log truck driver about 4-wheelers and snowmobiles.

Rare plants of Farwell Milfoil and Narrow leaf Gentian not adequately addressed in proposal.

Personally responding to incidents in the back country for nearly 18 years has shown that when there are roads; regardless how remote; folks go there, start fires, and have personal injury. When you improve existing infrastructure; the two track roads (old logging roads) are explored even deeper with improper gear and 2 wheeled drive vehicle transportation.....

In the case of fire, the the pine plantations are accessible from existing roads, as well as water supplies in these water rich areas as demonstrated by quick suppression by MDNR fire personal in the Silver Lake Basin and Powell Volunteer fire on the Yellow Dog Plains.....

In closing, I have walked these areas of the original proposal, and conclude that several impacting activities other than large scale hard rock mining have taken place. In flying the area(5000 square miles) several times I have concluded that the lands and folks have survived several impacts; until now... Not so on the 25 square mile Iron Ore mining district south of M28/41. Consider the legacy from this point...

A brief view.

Appreciate your consideration to the implied as well as the stated.

Chauncey J. Moran

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A servant of the King